

**From:** [Kerry Wahlen](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Wednesday, April 23, 2014 3:30:10 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of [Goldenwest Credit Union], which serves [Utah]. We have [96,300] Members and [\$1,027,000,000] in assets. [Goldenwest] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

1-The comment period should be extended to a year to allow for additional research and analysis.

2-A phase-in period for the regulation should be comparable to the banking industry. We would suggest a 5-7 year window.

3-Eliminate individual examiners from being able to make subjective requirements regarding risk based capital.

4-Delinquent consumer loans are weighted the same as performing mortgage or member business loans.

5-NCUA has encouraged becoming a Low Income Designation (LID) credit union. The risk based capital model then paralyzes credit unions that have a MBL exemption.

6-The weighting penalizes non-consumer lending which could force small credit unions to only make consumer loans on very low margins which would be a strategy that won't survive in the future.

7-The result of new risk based capital regulations would reduce lending in dramatic ways and stifle the economy.

8-The weighting of CUSOs needs to be revised as it is currently too high. We believe further analysis is needed regarding CUSOs that are not 100% owned by the credit union.

Summary of your position:  
[President/CEO]

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Kerry Wahlen  
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